

Document Page 1 of 1  
UNITED STATES BANKRUPTCY COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
LEROY JOHN BALZER	:	BK. No. 17-10652-TPA
KAREN ANN BALZER	:	
Debtors	:	Chapter No. 13
	:	
DITECH FINANCIAL LLC FKA GREEN TREE	:	Document No.
SERVICING LLC	:	
Movant	:	Hearing Date: September 5, 2017
v.	:	
LEROY JOHN BALZER	:	Hearing Time: 09:00 AM
KAREN ANN BALZER	:	
and	:	
RONDA J. WINNECOUR, ESQUIRE (TRUSTEE)	:	
Respondents	:	

**OBJECTION OF DITECH FINANCIAL LLC FKA GREEN TREE SERVICING LLC TO  
CONFIRMATION OF THE DEBTORS' CHAPTER 13 PLAN**

Movant, **DITECH FINANCIAL LLC FKA GREEN TREE SERVICING LLC** (hereinafter referred to as "Movant"), by its attorneys Phelan Hallinan Diamond & Jones, LLP hereby objects to confirmation of the Debtors' Chapter 13 Plan as follows:

1. Movant is **DITECH FINANCIAL LLC FKA GREEN TREE SERVICING LLC**.
2. Debtors, LEROY JOHN BALZER AND KAREN ANN BALZER, are the owners of the property located at 706 LINDEN AVENUE, ERIE, PA 16505.
3. On July 26, 2017, Movant filed Proof of Claim listing pre-petition arrears in the amount of \$10,203.86. A copy of the Proof of Claim is attached hereto as Exhibit "A" and made a part hereof.
4. Debtors' Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
5. Debtors' Plan currently provides for payment to Movant in the amount of \$7,522.00. A copy of the Debtors' Plan is attached hereto as Exhibit "B" and made a part hereof.
6. Movant objects to Debtors' Plan as it is underfunded. Debtors' Plan should be amended to fully fund the arrears owed to Movant. Confirmation of Debtors' proposed Plan should be denied.

WHEREFORE, **DITECH FINANCIAL LLC FKA GREEN TREE SERVICING LLC** respectfully requests that this Honorable Court deny confirmation of the Debtors' Chapter 13 Plan.

Respectfully Submitted,

/s/ Mario J. Hanyon, Esquire  
Mario J. Hanyon, Esq., Id. No.203993  
Phelan Hallinan Diamond & Jones, LLP  
Omni William Penn Office Tower  
555 Grant Street, Suite 300  
Pittsburgh, PA 15219  
Phone Number: 215-563-7000 Ext 31340  
Fax Number: 215-568-7616  
Email: mario.hanyon@phelanhallinan.com

Dated: August 18, 2017